

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 11-cr-10212
)	
JOHN WILLIS)	

MOTION TO BE APPOINTED AS COUNSEL UNDER
GENERAL ORDER 16-1 FOR DEFENDANT SEEKING RELIEF
UNDER *JOHNSON v. UNITED STATES*, 135 S.Ct. 2551 (2015)

Undersigned counsel respectfully asks to be appointed as counsel for the above-named defendant, for the purpose of preparing and filing a petition under 28 U.S.C. § 2255, seeking relief as a result of the Supreme Court's decision in *Johnson v. United States*, 135 S.Ct. 2551 (2015).

Lawyers at the Federal Defender Office have reviewed the above-named defendant's case and determined that he has a colorable claim for relief. They have referred the case to undersigned counsel, for the purpose of seeking appointment, under the Standing Order approved by the District Court on April 5, 2016.

Undersigned counsel is currently a member in good standing of the bar of this Court. Undersigned counsel also is a member of the CJA habeas panel for this Court.

Furthermore, the Defendant has previously been found indigent by this Court and received appointed counsel.

JOHN WILLIS

By his attorney,

/s/ Chauncey B. Wood

Chauncey B. Wood

Wood & Nathanson, LLP

50 Congress street, Suite 600

Boston, MA 02110

Tel. (617) 248-1806

cwood@woodnathanson.com

Certificate of Service

I hereby certify that this document, which was filed on this date through the ECF system, will be sent electronically on this date to all registered parties.

Date: April 28, 2016

/s/ Chauncey B. Wood

Chauncey B. Wood